

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

FILED  
2008 SEP -9 AM 9:22  
CLERK U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

ADAN PADILLA-VASQUEZ (1),  
ALFREDO ENRIQUE  
RAMIREZ-AYALA (3),

Defendants.

Criminal Case No. 07cr2531-W  
BY  DEPUTY

**PROTECTIVE ORDER REGARDING  
MEDICAL RECORDS DISCOVERY**

Pursuant to the stipulation of the parties, Federal Rule of Criminal Procedures 16(d)(1), and General Order No. 514 of the United States District Court for the Southern District of California ("General Order No. 514") pertaining to privacy matters, it is hereby ORDERED as follows:

1. All hospital records, pharmaceutical records or other medical records discovery pertaining to the material witnesses or others involved in the September 1, 2007 rollover accident ("Discovery") produced by the United States in this case is for use by defendant and defense counsel (the "Defense") in this case and any appeals of this case and for no other purpose. This Discovery produced by the United States may not be further disseminated in any way to any other person or entity except as set out in this Protective Order.

2. The Defense shall take all reasonable steps to (a) maintain the confidentiality of this Discovery and (b) safeguard this Discovery from inadvertent disclosure to any third party not authorized to view it under this Protective Order.

3. The Defense may share this Discovery material with any clerks, investigators, consultants or experts retained or used by the Defense in connection with this case provided that the Defense informs any such individual(s) of this Order and obtains their written consent to comply with and be bound by its terms.

4. The Defense may show witnesses this Discovery as necessary for the preparation of the

1 defense, but witnesses may not be given copies of the materials.

2 5. The Defense shall return any and all copies of this Discovery to the United States or provide  
3 the United States with a letter certifying that this Discovery and any and all copies have been destroyed  
4 within 90 days of the conclusion of the proceedings in the above-referenced case, including the  
5 exhaustion of any subsequent appeal(s).

6 6. To the extent that any of the above-referenced criminal Discovery materials contain any  
7 individual's personal information, within the meaning of General Order 514, any filings or trial exhibits  
8 referencing or containing said materials must be redacted in a manner consistent with said General  
9 Order.

10 7. If defense counsel withdraws or is disqualified from participation in this case, any Discovery  
11 produced pursuant to this order shall be returned to the United States within 10 days.

12 Approved as to form:

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15 Knut S. Johnson, Esq.  
16 Counsel for Defendant Adan Padilla-Vasquez

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18 Ellis M. Johnston III, Esq.  
19 Counsel for Defendant Alfredo Enrique Ramirez-Ayala

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21 Lawrence A. Casper  
22 Assistant U.S. Attorney  
23 Counsel for the United States of America

23 IT IS SO ORDERED.

24 DATED: 9/8/08  
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27 Thomas J. Whelan  
28 United States District Judge